



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

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Philadelphia, Pennsylvania 19107

MAY 23 1987

Timothy Rogers, Esq.
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American Can Packaging Co.
American Lane
P.O. Box 2600
Greenwich, Connecticut 06836-2600

Re: Taylor Borough Site; U.S. v. Seratini

Dear Tim:

Enclosed please find the revised Exhibit 3. The changes that have been made were the ones Glenn Nestel requested Patricia Tan to make.

By means of this letter, I am transmitting the original to Bruce Brandler.

Please contact me at (215) 597-9951 should you have any questions with respect to the above.

Sincerely yours,

Lydia Isaacs
Lydia Isaacs
Assistant Regional Counsel

cc: Steve Baer, Esq.
Jim Dougherty, Esq.
Patricia Tan
Marc Gold, Esq.
Michael Dolan, Esq.
Theodore Craver, Esq.
Jim Murray, Esq.
Thomas Styczen, Esq.
Noel Bartsch
Bruce Brandler

AR301227

WORK PLAN
TAYLOR BOROUGH LANDFILL SITE
TAYLOR BOROUGH, LACKAWANNA COUNTY
PENNSYLVANIA

AR301228

April, 1987

1.0 INTRODUCTION

This Work Plan contains an overview of the site remediation and associated construction activities, standards, specifications and schedule of completion applicable to the remedial action agreed to be undertaken by American Can Company, Chamberlain Manufacturing Company, Litton Industries, Incorporated and RCA Corporation (the "Settling Defendants") at the Taylor Borough Landfill Site ("Site") near Scranton, Lackawanna County, Pennsylvania. The Work Plan was prepared to meet the requirements of the Environmental Protection Agency's ("EPA") Record of Decisions ("ROD") of June 28, 1985 and March 17, 1986.

Also contained in this Work Plan is a list and brief summary of the project documents which contain the standards and specifications for the approved remedial action. The intent of this Work Plan is to provide an overview of the work required or contemplated by the following project documents and it should in no way be construed to limit that which has already been agreed to and submitted. As indicated below, the following project documents were either previously submitted to and approved by EPA, or will be submitted for approval in the near future. Documents 1 and 2 below are herein incorporated by reference. Documents 3, 4, and 5 below are to be incorporated upon approval by EPA.

- 1) Report titled "Taylor Borough Landfill Site, Final Closure Plan, Taylor Borough, Lackawanna County, Pennsylvania", prepared by Fred C. Hart Associates, Inc., dated June, 1986, revised September, 1986, (submitted to and approved by EPA);
- 2) Drawings titled "Taylor Borough Landfill Site, Final Closure Plan, Taylor Borough, Lackawanna County, Pennsylvania", prepared by Fred C. Hart Associates, Inc., various dates, (submitted to and approved by EPA);
- 3) Draft Report titled "Taylor Borough Landfill Site, Background Contamination Study Report, Taylor Borough, Lackawanna County, Pennsylvania", prepared by Fred C. Hart Associates, Inc., dated March, 1987 (to be submitted to EPA);
- 4) Construction specifications titled "Taylor Borough Landfill Site, Construction Specifications and Bid Documents, Taylor Borough, Lackawanna County, Pennsylvania", prepared by Fred C. Hart Associates, Inc., March, 1987 (to be submitted to EPA)

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- 5) Report titled "Taylor Borough Landfill Site, Site Remediation Health and Safety Plan, Taylor Borough, Lackawanna County, Pennsylvania", prepared by Fred C. Hart Associates, Inc., undated. (to be submitted to EPA).

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2.0 SCOPE OF WORK

The Work Plan falls into two categories; those tasks involving hazardous substances ("Hazardous") and those tasks not involving hazardous substances ("Non-Hazardous"). The distinction is made based upon the contaminant levels found by EPA and its consultant at the Site and the remediation requirements set-forth in the June 28, 1985 ROD. As a result, the Work Plan has been divided into two segments which define and distinguish the required activities for each category at the appropriate locations on the Site.

The June 28, 1985 ROD is based upon the information provided by NUS Corporation, EPA's consultants, in its Remedial Investigation and Feasibility Study (RI/FS) Reports dated May, 1985. NUS identified in Section 6.4 of the RI report, and EPA confirmed, the primary public health concerns at the Site to be:

Potential contact (dermal) with the contaminated debris remaining onsite.

Potential contact (dermal) with the contamination in the soil structure.

Inhalation of vaporous odors emitted from the Site.

The June 28, 1985 ROD requires that Drum Storage Areas 3 and 6 (Figure 1), and the area between Drum Storage Areas 3 and 6, be closed with a soil cover to prevent dermal contact with the soils, and "minimize the translocation of low level contaminated surface soils where sample results indicate higher than background levels". Similarly, a soil cover is required to prevent dermal contact with the soils in and around Drum Storage Area 4.

The June 28, 1985 ROD requires that Drum Storage Areas 1 and 2 and Ponds 1 and 2 be remediated by removing that material showing elevated levels of volatiles and solvents to background levels. Background levels for this Site will be established in the Background Contamination Study Final Report. EPA and the Settling Defendants have mutually agreed that EPA Test Method 624 is the appropriate analytical method for use in the Background Contamination Study.

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FIGURE 1



APPROXIMATE SITE LIMITS
TAYLOR BOROUGH SITE, TAYLOR BOROUGH, PA
SCALE AS SHOWN

LEGEND
AREA 1
AREA 2
AREA 3
AREA 4
APPROXIMATE LIMITS OF
SITE
BISHOP'S LANDFILL (INACTIVE)

As with Drum Storage Areas 3, 4, and 6, a soil cover is to be constructed in Drum Storage Areas 1 and 2 following the excavation work to prevent dermal contact with the remaining soils. The water in Ponds 1 and 2 is to be removed and properly disposed of and the area regraded and sloped so as to prevent future ponding. Proper erosion control techniques and site access restrictions are to be incorporated into the final closure plan.

The following sections provide an overview of the activities that will occur pursuant to this Work Plan. Section 2.1 presents the activities associated primarily with Drum Storage Areas 1 and 2/Ponds 1 and 2, while Section 2.2 describes the activities for the remainder of the Site. In Section 2.3, the elements of the various documents are discussed.

2.1 Site Remediation Activities - Hazardous

This aspect of the remediation process addresses the areas at the site identified as involving hazardous substances, requiring an elevated level of protection for onsite personnel and monitoring of activities to provide protection for the residential population. Construction activities that will occur as part of this phase of the Work Plan include but are not limited to:

Placing temporary erosion control features (straw bales or silt fences) around construction areas as necessary.

Clearing and grubbing of vegetation from within the areas of construction activity.

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Excavating the identified areas of contamination; staging in the preselected area.

Monitoring the excavated material and excavation limits for contamination levels above background using prescribed, approved field monitoring techniques.

Draining Ponds No. 1 and 2, pumping the liquid into tank trucks for treatment at an offsite treatment facility.

Grading all the Drum Storage Areas with a minimum of two feet of unclassified clean fill material to isolate the storage surfaces.

2.2 Site Remediation Activities - Non-Hazardous

This aspect of the remediation process addresses the tasks identified as involving materials that are not hazardous substances, thus not requiring an elevated level of personnel protection and monitoring. Construction activities that will occur during this phase of the Work Plan include but are not limited to:

Installing a culvert as a temporary surface water conveyance.

Constructing a perimeter surface water control channel as a temporary control measure. Installation of erosion control features (straw bales, silt fences) as required.

Completing site grading with unclassified clean fill material, to the lines and grades presented in the design drawings.

Constructing headwalls and trashracks at ends of culverts.

Constructing clay cover and toe anchor as per the design drawings.

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Placing of topsoil over cover.

Placing of channel linings.

Reconstructing the site access road.

Revegetating all exposed soil areas and mulching.

2.3 Project Documents

As stated in the introduction, details of the Work Plan are presented through the five (5) project documents. Each of these has an important role in the site remediation. The contents and purpose of the various documents are summarized below:

The Final Closure Plan Report is the foundation for the other documents and the remedial action at the Site. It describes the scope, purpose, and intent of the Work, along with a brief historical perspective and select detailed information.

The Drawings and Construction Specification documents contain or will contain technical details that will be required by the Contractor and Construction Manager to implement the Final Closure Plan. These documents provide or will provide the technical basis for the physical activities undertaken at the Site and the decisions made during the remedial action.

The Background Contamination Study Report is important in defining the extent of excavation required at the site. Following EPA review and approval, the site specific contaminant background levels will be used by EPA and the Settling Defendants' Contractor to identify the excavation limits via the approved field screening and sampling plan. These data and test protocol will determine the extent of soil excavation activities.

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Finally, the Health and Safety Plan will be the guide to worker and resident safety during the performance of the work. It will contain monitoring requirements and schedules, allowable exposure levels for the onsite personnel, action levels for the onsite personnel, action levels for standby and emergency responses, and descriptions of emergency and other procedures to be followed during the activities. This report, prepared in conjunction with the selected contractor, will be presented to the EPA.

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3.0 DEFINED TASKS AND MILESTONES

Based on the discussion of activities presented in Section 2.0, the following items are tasks and milestones associated with such activities. Included with each is a brief description of the activities included as part of the task.

Project Coordination - This task involves the activities to be undertaken prior to the initiation of the field work, including the bidding process, selection of contractors and submission to EPA of the Health and Safety Plan.

Project Startup - This is the first day of onsite activities.

Site Preparation - This task involves all site related activities that will occur prior to the start of removal and fill placement operations and will include equipment mobilization, establishment of the field offices and facilities, site clearing and grubbing, installation of temporary erosion control features, staging area preparation, establishing security, and other project coordination and management activities.

Soil Removal - This task encompasses the activities associated with the removal of the contaminated soil in Drum Storage Areas 1 and 2/Ponds 1 and 2. Included as part of this task are the excavation, staging, field screening, laboratory testing, transportation, and disposal of soils and drum remnants, along with the removal, and off-site treatment and disposal of the water found in Ponds 1 and 2. The final activity under this task will be to decommission the staging area.

Closure Construction - The activities associated with this task will involve the placement of all fill materials, clay cap over Drum Storage Areas 1 and 2, sand, topsoil, and surface water management features described in the Closure Plan.

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Final Site Activities - Under this task, all final Site activities will occur. Considered as part of this task are the revegetation of the site reconstruction of the access roads, installation of the site fencing, and demobilization of all the onsite personnel, equipment and facilities.

Project Completion - This is the day of the completion of project activities, denoted to identify the last day onsite.

4.0 PROJECT SCHEDULE

To ensure the work is completed in a reasonable and timely manner, a schedule for the project milestones has been established. The completion of each major task, as defined in Section 3.0, will be considered a milestone for this project. Other activities within each of these tasks will be scheduled independently by the Contractor and the Settling Defendants so as to meet the schedule deadlines.

The schedule for the identified tasks are as follows:

Project Startup - The Contractor will be onsite within 90 calendar days after the Consent Decree is entered by the Court.

Site Preparation - Within 15 days of the Project Startup, the Contractor will be fully mobilized and will have the site prepared to remove contaminated soils and drum remnants.

Removal of Materials Hazardous - Within 60 days of the Project Startup, the removal of contaminated soils and drum remnants will be completed.

Closure Construction - Within 120 days of the Project Startup, the closure capping and surface water management features construction will be completed.

Final Site Activities - Within 30 days of the completion of the Closure Construction, the Contractor will have completed the final site activities required and will demobilize.

Project Completion - On or before October 31, 1987, the project will be complete based on the above schedule, assuming a timely starting date, and no force majeure events occur.

This schedule is present in graphic format in Figure 2.

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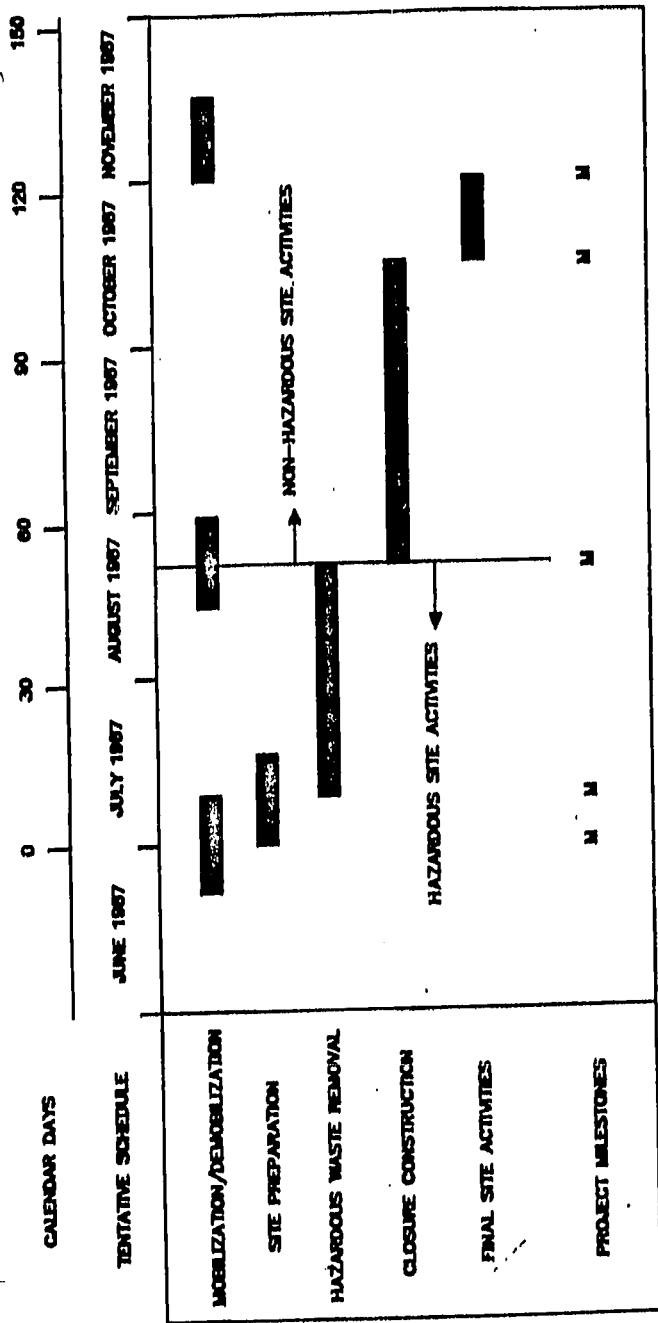


FIGURE 2

PROJECT IMPLEMENTATION SCHEDULE
TAYLOR BOROUGH LANDFILL SITE
LACKAWANNA COUNTY, PENNSYLVANIA

AR301240

EXHIBIT 4

PAYMENT TO TAYLOR BOROUGH SITE TRUST FUND

Litton Industries, Inc.;	(35.0%)
Litton Systems, Inc.; Litton	
Business Systems, Inc.;	
Technographics Corporation; and	
Technographics Fitchburg Coated	
Products, Inc.	
Chamberlain Manufacturing	(32.5%)
Corporation	
American Can Company	(16.25%)
RCA Corporation	(16.25%)

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